



BILL AUDITABILITY & DISPUTE RESOLUTION PLAN MIDWEST STATUS REPORT

I. Introduction

SBC Midwest filed a Bill Auditability and Dispute Resolution Plan (“the Plan”) with each of the state Commissions.¹ This document provides a final status report on SBC’s implementation of the actions described within the Plan. This report consists of three additional sections as follows:

Section II Status – Provides a summary of SBC’s progress to date, demonstrating that all of SBC’s required action items have been completed.

Section III Other Issues – Provides an overview of miscellaneous issues, if any, related to the Plan.

Section IV Recently Completed Tasks – Provides details concerning tasks completed since the July 31, 2003 Status Report (“7/31/03 Status Report”).

II. Status

In Section 3 of the plan, SBC asserted that it would complete several actions to address state Commission and CLEC concerns regarding billing auditability and the billing dispute resolution process. SBC’s completion of all actions scheduled within the current reporting period fulfills all identified actions documented within the plan. As such, this document serves as the final quarterly status report for this plan.

Key deliverables executed in support of the plan include:

- Development of the USOC reference guide to the SBC Midwest region’s state pricing schedules for the multi-state generic interconnection agreement.
- Development of State Specific Tariff USOC Reference Guides mapping USOCs to the UNE and Interconnection Parts of the Michigan, Illinois, Wisconsin, and Indiana tariffs (Tariff No. 20, Part 19 and Tariff No 20, Part 23).
- Development and delivery of enhanced training to all Billing Claim/Dispute Service Representatives, including use of the Claims Investigation Process Checklist.
- Ongoing sampling of processed billing claims to ensure accuracy and completeness.
- Updates to the CLEC Billing Workshop course.
- Enhancement to the subject line of the billing dispute confirmation and completion notices to more clearly identify the claim responses.

¹ See Bill Auditability and Dispute Resolution Plan filed on 4-2-03 in Michigan (MPSC Case No. U-12320), on 5-1-03 in Illinois (ICC Docket No. 01-0662), on 7-1-03 in Wisconsin (PSCW Proceeding No.6720-TI-170), on 7-3-03 in Ohio (PUCO Case No. 00-942-TP-COI), and on 7-11-03 in Indiana (IURC Cause No.41657).



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The Billing Subcommittee formed in February 2003 at the CLEC User Forum (CUF) continues to meet monthly to address billing dispute resolution issues. This committee serves as a vehicle to raise and resolve CLEC billing issues and jointly improve dispute claim handling processes. As of the October 21, 2003 CLEC Billing Subcommittee call, a total of 61 issues have been submitted. Of these, 43 have been resolved satisfactorily and are formally closed, 4 are resolved but being monitored, and the remaining 14 are being actively worked. SBC continues its commitment to address these remaining issues.

Further, the quarterly quality reviews conducted on billing claims processed demonstrate SBC's full and continued compliance with the action items centered on improving billing claims processing and communication.

III. Other Issues

As of the 7/31/03 status report, 42 of the 44 existing Billing Claim & Dispute representatives in place at the time of the April 2, 2003 filing at the Michigan Public Service Commission (MPSC) of the Plan had received Bill Auditability and product overview training. The remaining two individuals completed training as of September 30, 2003.



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IV. Recently Completed Tasks

Action Plan/Task	Begin	End	Status
(A) CABS Billing Auditability – Bill Auditability Support Actions			
<ul style="list-style-type: none">• Work with Billing Subcommittee formed during CUF and report progress	3/5/03	Ongoing	<ul style="list-style-type: none">• Sixty-one CLEC billing issues have been raised since the subcommittee formed on February 19, 2003. To date, 43 of these issues have been closed. Four (4) are in monitor status, three as part of the Performance Measurement collaborative and one is awaiting completion of a system enhancement targeted for January 2004. The remaining 14 are open and being actively addressed. Status on open issues is provided during the monthly Billing Subcommittee call.• The Issues Log continues to be used to document status on each issue raised and is updated and posted prior to the next call on the CLEC Online; it can be found at https://clec.sbc.com/clec, click on the CLEC User Forum box, under SBC – All Regions choose BILLING DISPUTE LOG-for 10/21/03 Sub-Team Meeting.



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Action Plan/Task	Begin	End	Status
<ul style="list-style-type: none"> Prepare USOC reference guide for CLEC specific ICA upon CLEC's request via its account manager 	4/7/03	Ongoing	<ul style="list-style-type: none"> During the current reporting period, SBC has received and fulfilled a total of eight ICA mapping requests. These requests were submitted by five different CLECs (two of the CLECs requested mappings for multiple states).
<ul style="list-style-type: none"> Evaluate the feasibility of other CLEC training delivery methods. 	4/1/03	9/30/03	<ul style="list-style-type: none"> SBC has evaluated the feasibility of providing self-paced, alternative media training to CLECs and has in fact begun deploying some course offerings. Two of the available courses support CLECs in SBC's Midwest 5-State region.² They are: <ul style="list-style-type: none"> <i>UNE-P Billing</i> training to assist CLECs in reading and interpreting the bills received from SBC Midwest for UNE-P was deployed in October 2003 and is available for download on the CLEC Online. <i>Access Ordering System</i> (13- state) training on issuing Access Service Requests (ASR) using the Access order website was deployed in August 2003 and is available via CD-ROM or download. A "Self-Paced Training" link has been added to the CLEC Education page of CLEC Online, which takes users to the screen where they may request CD-ROMs or initiate downloads of available alternate media training. Web-based training for the CLECs in support of the new web-based CLEC Profile process is under development, and is anticipated to be implemented in the first quarter of next year.

² In addition, a *CEASE* (Consumer Easy Access Sales Environment) *Conversion* (SW Region only) was deployed in July 2003 and is available via CD-ROM.



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Action Plan/Task	Begin	End	Status
(B) Billing Dispute Resolution – Dispute Resolution Process Improvements			
<ul style="list-style-type: none">Report summary of results of quality assurance review program, including deviations found and corresponding corrective action.	3/3/03	9/30/03	<ul style="list-style-type: none">The 3rd quarter report summary of the results of the quality assurance review program is included as Attachment A.